

Section 114-60.3 — Property Inventories

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114-60.300 - Definitions

See [Section 114-60.100](#) of the Interior Property Management Directives for definitions relevant to this policy section.

114-60.301 - Responsibilities

- a. The Director, Office of Acquisition and Property Management (PAM) is responsible for the development of Department-wide policy and oversight of the Department of the Interior (DOI) government-owned personal property management function, including museum property.
- b. The bureau or office Property Management Officer (PMO) (in some bureaus or offices the respective National/Chief Curator [NCC] is responsible for DOI museum collections; and the applicable Property Management Officer responsibilities apply to the NCC according to bureau or office policy) is responsible for the following items:
 1. Administering, coordinating, and managing the bureau or office government-owned personal property program, including managing the inventory process for all bureau/office government-owned personal property accounts, as identified in bureau or office policy.
 2. Providing guidance and direction to contracting offices for government-owned personal property acquisitions as required by the Federal Acquisition Regulation (FAR) and internal DOI standards.
 3. Designating, in writing, the Accountable Property Officer (APO) for the accountable property area to which the APO is assigned.
- c. The Accountable Property Officer (APO) is responsible for the following items:
 1. Enforcing necessary administrative measures to ensure the proper preservation and appropriate use of all government-owned personal property under his or her jurisdiction.

2. Accounting for and controlling a specified group of government-owned personal property items under his or her jurisdiction
 3. Ensuring the completion of required government-owned personal property inventories in accordance with the provisions of Departmental and bureau or office policies, including delegation of inventory responsibility to another individual within the APO's area of responsibility, as appropriate.
 4. Recording promptly all reports of lost, stolen or damaged government-owned personal property assets.
 5. Designating Custodial Property Officers (CPO) and Inventory Data Collectors (IDCs or Inventory Counters) in writing.
- d. The Custodial Property Officer (CPO) is responsible for the following items:
1. Managing and overseeing assigned government-owned personal property on a daily basis.
 2. Notifying the APO and appropriate security officials of incidents involving the loss or theft of government-owned personal property.
- e. Inventory Data Collectors (IDCs or Inventory Counters) are responsible for the following items:
1. Conducting an inventory of government-owned personal property.
 2. Completing the appropriate training prior to conducting a property inventory.
 3. Notifying the CPO and APO of any property assets that cannot be located during an inventory, assets discovered during the inventory, or inventory errors found during the property inventory.
- f. Supervisors are responsible for the following items:
1. Safeguarding all government-owned personal property on the property inventories under his or her jurisdiction.
 2. Ensuring compliance with all Departmental and bureau or office property management policies and procedures.
- g. Cognizant Employees are responsible for the following items:
1. Safeguarding all government-owned personal property under his or her jurisdiction.
 2. Making all assigned government-owned personal property available for inventory.
 3. Reporting assigned Federal property that is lost, missing, damaged, or stolen in a prompt manner.
 4. Returning government-owned personal property to the CPO when no longer required or as part of the exit clearance process.

114-60.302 - Inventory Frequencies and Methods

- a. Frequencies
1. Firearms and less-lethal weapons (e.g., TASERS, stun guns, dart guns, batons, electronic control devices, and training weapons), and museum property that is controlled property, must be inventoried annually at a minimum.
 2. Explosives, gases, gunpowder, chemical agents, and ammunition must be inventoried annually at a minimum.

3. System-controlled government-owned personal property, such as desktop and laptop computers, notebooks, and tablets, regardless of acquisition cost, and museum property that is not controlled property, must be inventoried biennially at a minimum.
 4. Bureau-managed government-owned personal property is inventoried at a frequency determined by bureau/office policy.
 5. Special inventories must be conducted upon notification of the theft or loss of firearms, less-lethal weapons, explosives, gases, gunpowder, chemical agents; and ammunition.
 6. Special property inventories are conducted as required during change of designations for an interim or acting APO/CPO, a new APO/CPO, in the course of inspections and/or audits, or other special circumstances (see [Appendix 1](#)).
 7. Special inventories of government-furnished property must be conducted upon the termination of leases, grants, and cooperative agreements.
- b. Inventory Methods
1. One Hundred Percent (100%) — One hundred percent of the assets in the population at a given location are identified to be inventoried. This inventory method involves physically touching or scanning the barcodes of 100 percent of the property subject to the inventory. See section [302 b 3. Physical Inspection](#).
 2. Statistical Random Sampling — The statistical random sampling method reduces the total population of assets to be inventoried to a statistically reliable and manageable sample size. To establish the sample size, the APO, CPO and/or inventory data collectors must complete the following actions:
 - i. Determine the random sample size from the total population of the assets being inventoried. To ensure statistical validity, the table in [Appendix 2](#) of this Directive provides the random sample size based on the total property population.
 - ii. Determine the list of randomly generated items to inventory.
 3. Physical Inspection — This method involves physically inspecting the asset. To conduct this method, the APO, CPO and/or inventory data collectors must complete the following actions:
 - i. Obtain an inventory list of all property and their locations.
 - ii. Confirm that each asset on the inventory list is at the location noted on the property record.
 - iii. Verify the data required in section [302 c. Mandatory Inventory Data](#) and update the property record as needed.
 - iv. Document any missing assets and investigate their whereabouts as soon as possible.
 - v. Certify that the inventory was completed.
 4. Inventory by Exception — This inventory method uses actions or transactions, (e.g., move orders, maintenance actions, calibration checks, usage logs, network connections) where the items are "touched" by persons without stewardship responsibilities, with supporting documentation directly associated

with an accountable asset. IT equipment connected to the DOI network can be inventoried through electronic means. Toward the end of the inventory cycle, an inventory is then performed on items not already accounted for by an action or transaction during the inventory period. If applicable, these types of inventories must be documented as part of the inventory plan and are subject to internal control procedures to ensure the validity of accountable property records. To conduct inventory using this method the APO, CPO, and/or inventory data collectors must complete the following actions:

- i. Obtain an inventory list of assets and their locations based on the method elected in section [302 b. Inventory Methods](#)
 - ii. Check the inventory list of assets to see if any of the property records indicate that the date of last inventory and/or inventory note data fields were updated during the inventory cycle. If so, then those assets are not to be inventoried again.
 - iii. Conduct a physical inspection for any remaining sample population left on the inventory list without an updated date of last inventory note with an inventory by exception, the inventory counters must conduct a physical inspection on those assets.
 - iv. Verify the data required in section [302 c. Mandatory Inventory Data](#), and update the property record as needed.
 - v. Document any missing assets and investigate their whereabouts as soon as possible.
 - vi. Certify that the inventory is complete.
5. Transaction-based Inventory — This inventory method uses electronic or hard copy documentation of property transactions to verify the existence of assets listed on the inventory without physically touching an asset. An asset is considered to be inventoried if documentation exists of a transaction (e.g., transfer, warehousing, location change, issue, receipt, loan, or any movement of the asset/object) that an APO, CPO, or Cognizant Employee performed involving physical contact with and inspection of the asset during the scheduled inventory cycle. To conduct this method, the APO, CPO, and/or inventory data collectors must complete the following actions:
- i. Obtain an inventory list of assets and their locations based on the method selected in [302 b. Inventory Methods](#)
 - ii. Check the inventory list of assets to see if any of the property records indicate that the date of last inventory and/or inventory note were updated during the inventory cycle, then those assets are not to be inventoried again.
 - iii. Conduct a physical inspection for any remaining sample population left on the inventory list without an updated date of last inventory note. Please note with transaction-based inventory, the inventory counters must conduct a physical inspection on those assets.

- iv. Verify the data required in section [302 c. Mandatory Inventory Data](#), and update the property record as needed.
 - v. Document any missing assets and investigate their whereabouts as soon as possible.
 - vi. Certify that the inventory was completed.
- c. Mandatory Inventory Data
 - The following mandatory data must be completed and verified during an inventory:
 - 1. Assets Found: The presence of an item is verified by employing one of the accepted inventory methods and comparing the item located to the record on the property inventory.
 - 2. Item Count: The number of items is verified by comparing the number of items inventoried with the number on the property record.
 - 3. Location: The location of the item on the property record is verified by comparing it with the actual physical location.
 - 4. Date of Last Inventory: The date each asset is inventoried. This is a data element in the Financial and Business Management System (FBMS). (Note: will apply to museum collections when the capability to record this data for museum objects is added to the Interior Collections Management System.)
 - 5. Inventory Note: Note the method used to inventory the asset. This is a data element found in FBMS. (Note: will apply to museum collections when the capability to record this data for museum objects is added to the Interior Collections Management System.)
 - 6. Serial Number: Verify the serial number on the equipment matches the inventory list. (Note: does not apply to museum collections)
 - 7. Make: Verify the make of the equipment matches the inventory list. (Note: does not apply to museum collections)
 - 8. Model: Verify the model of the equipment matches the inventory list. (Note: does not apply to museum collections)

114-60.303 - Inventory Reconciliation

- a. Reconciliation of an inventory
 - 1. All property records and the related general ledger accounts must be brought into agreement based upon the results of property inventories. Any adjustments must be documented.
 - 2. Any differences found on the property inventory versus the count of property on hand and the quantity balance on the property records must be promptly investigated to determine the causes of the differences, and to identify necessary improvements to inventory procedures.
 - 3. Bureaus and offices must complete inventory reconciliations, including necessary adjustments and Reports of Survey (DI-103), prior to submitting the annual internal control review and assurance statement for property management.
- b. Missing Asset

If an asset is determined to be missing during an inventory, the following procedures must be carried out by property staff (APO, CPO, and/or IDCs), with assistance provided by cognizant employees, as appropriate

1. Obtain the pertinent inventory records, along with photographs (if available), for use during the investigation.
2. Search storage and other areas thoroughly when applicable.
3. Update property record if the missing item is located; no further action is required.
4. Record the object as "missing" in the property record if the missing item cannot be located. Use additional notes to document all pertinent information concerning the missing item. Professional judgment must be used to determine whether to notify investigative or law enforcement officials concerning the possibility of theft of the missing item.
5. Complete the following steps if the missing item cannot be located and is controlled property,:
 - i. Contact law enforcement or other appropriate investigating official as soon as practicable.
 - ii. Document the missing asset by initiating a Lost, Damaged, or Destroyed Report.
 - iii. Provide copies of the property record and available photographs to the investigating official and obtain a copy of the completed Lost, Damaged, or Destroyed report.
 - iv. Include copies of the Lost, Damaged or Destroyed Report and other documentation related to the missing asset with the property record for the asset.
6. Record the status of the asset as "missing" in the official record where documentation concerning the missing asset will be filed.
7. Complete a Report of Survey (DI-103) within 30 days of discovering that government-owned personal property is missing and cannot be located,. See [114-60.800, Survey Procedures](#).
8. Annotate the applicable Asset Master Records to indicate a Report of Survey (DI-103) is being processed for missing assets.
9. Research errors to determine the cause(s) of the loss and/or complete a special inventory as identified in [Appendix 3](#) .
- c. Asset discovered during inventory
If an asset is discovered during inventory that was not previously documented in the organization's property records, the individual must follow the appropriate acquisition or disposition procedures to account for the asset.

114-60.304 - Inventory Reports and Certification

- a. All bureaus and offices must generate a report for inventories conducted. The inventory certification statement verifies (1) that inventories are conducted as required; (2) inventory data is accurate with any inaccuracies reconciled, and (3) that the Asset

Master Record in FBMS is updated as required per the [Mandatory Inventory Data](#) section in this policy.

1. The APO must certify the scheduled property inventories conducted during the fiscal year and submit the certification and supporting documentation to the PMO.
2. The PMO must verify completeness of all APO certifications and forward a consolidated certification memorandum, signed by the cognizant bureau executive, and submitted to the Director, Office of Acquisition and Property Management, as part of the bureau's annual internal control review and assurance statement for property management.
3. Due dates for property certifications will be established in the annual Office of Acquisition and Property Management internal control guidance. The reporting due date will not be any later than September 30th of each fiscal year.

114-60.305 - Inventory Documents Retention

All inventory documentation, including electronic files/notes or hard copy printouts used in the inventory process, must be retained until the third succeeding inventory has been completed. The earliest records must then be removed from the files. Exception: All inventory documentation, including electronic files or paper copy printouts used in the inventory process, must be retained for firearms and less-lethal weapons for the entire lifecycle of these assets.

114-60.306 - Inventory Training Requirements

All employees who have oversight over firearms, less-lethal weapons and ammunition activities must complete firearms accountability training annually per [DOI-AAAP-0013, Joint Policy Memo - Mandatory Firearms Accountability Course](#).

Appendix 1 - Technical Guidance: Decision Guide for Inventory Requirements; Change of Designated Authority

Accountable Property Officer	Custodial Property Officer	Inventory Required
The outgoing APO has certified all of the property accounts before the inbound APO arrival. The inbound APO signs an acceptance of responsibility letter to PMO.	The outgoing CPO has conducted a property inventory before the inbound arrives. The inbound CPO signs an acceptance of responsibility letter to the APO.	No
The outgoing APO did <u>not</u> certify all of the property accounts before the APO arrives, but the inbound APO signs an acceptance of responsibility letter for all of the property accounts.	The outgoing CPO did <u>not</u> sign a property inventory before the inbound CPO arrives, but the inbound CPO signs an acceptance of responsibility letter for the property account.	No
The outgoing APO did <u>not</u> certify all of the property accounts before the inbound APO arrival. The inbound APO did <u>not</u> sign an acceptance of responsibility letter for all of the property accounts.	The outgoing CPO did <u>not</u> sign a property inventory before the inbound CPO arrives and the inbound CPO did <u>not</u> sign an acceptance of responsibility letter for the property account.	Yes

Appendix 2 - Technical Guidance: Statistical Random Sample Table*

Population	Sample Size	Maximum Error Rate	Population	Sample Size	Maximum Error Rate
10	10	1	400	200	10
20	19	1	450	212	11
30	28	1	500	222	11
40	36	2	600	240	12
50	45	2	700	255	13
60	52	3	800	267	13
70	60	3	900	277	14
80	67	3	1000	286	14
90	74	4	1500	316	16
100	80	4	2000	333	17
125	95	4	3000	153	18
150	109	5	4000	164	18
175	122	6	5000	370	19
200	134	7	10000	384	19
250	154	8	20000	392	20
300	172	9	50000	397	20
350	187	9	100000	398	20

* Content provided by [Research Randomizer](#)

NOTE: The Statistical Random Sample Table appropriate to museum collections is provided in [DOI Museum Directive 21](#), Inventory of Museum Collections.

Appendix 3 - Technical Guidance: Research Requirements Based on Error Rates Determined During Property Inventory

Government-owned personal property Thresholds	Error Rate	Research Requirements
1. Equal to or less than \$5,000 bureau-managed government-owned personal property (includes government-owned personal property leases)	5%	<p>Research is not required if the 5% error rate is not exceeded. The PMO or APO or both can remove the asset from the property inventory and the inventory is complete.</p> <p>Research is required if the error rate is greater than 5% to find the root causes for the errors. If the assets are lost, missing, stolen or damaged, a Report of Survey must be initiated.</p>
2. Equal to or greater than \$5,000, but less than \$15,000 system-controlled government-owned personal property (includes government-owned personal property leases)	5%	<p>Research is not required if the 5% error rate is not exceeded. The PMO or APO both can remove the asset from the property inventory unless the errors involve computers.</p> <p>Research is required if the error rate is greater than 5% to find the root causes for the errors. If the assets are lost, missing, stolen or damaged, a Report of Survey must be initiated.</p>
3. Equal to or greater than \$15,000 capitalized equipment (includes government-owned personal property leases)	0%	<p>Research is not required when no errors are found.</p> <p>Research is required on any errors involving capitalized equipment to find the root causes for the errors. If the assets are lost, missing, stolen or damaged, a Report of Survey must be initiated.</p>
4. Firearms and less-lethal weapons and museum property that is controlled property (regardless of cost)	0%	<p>Research is not required when no errors are found.</p> <p>Research is required on any errors involving firearms, other weapons, explosives, gases, gunpowder, chemical agents' ammunition, and museum property that is controlled property to find the root causes for errors. If the assets are lost, missing, stolen or damaged, a Report of Survey must be initiated.</p>
5. Suspected fraud, waste, or abuse	0%	Any error found in 1, 2, 3, and 4 that appears to be a result of fraud, waste or abuse must be reported directly to the Office of Inspector General